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8 **UNITED STATES DISTRICT COURT**  
9 **NORTHERN DISTRICT OF CALIFORNIA**  
10 **OAKLAND DIVISION**  
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12 LAURI VALJAKKA,

13 *Plaintiff,*

14 v.

15 NETFLIX, INC.,

16 *Defendant.*

Case No. 4:22-cv-01490-JST

**[PROPOSED] ORDER GRANTING  
NETFLIX, INC.'S MOTION FOR AN  
ORDER TO SHOW CAUSE AND  
SANCTIONS AGAINST PLAINTIFF'S  
FORMER ATTORNEY, WILLIAM  
RAMEY AND RAMEY LLP**

1 On February 18, 2025, Defendant Netflix, Inc. (“Netflix”) filed its Motion for Order to  
2 Show Cause and Sanctions.

3 The Court, having reviewed the evidence in support of the Motion for Order to Show Cause  
4 and Sanctions, HEREBY ORDERS that Defendant Netflix’s Motion is GRANTED and Orders the  
5 following:

6 The Court ORDERS William Ramey and Ramey LLP to show cause as to why they should  
7 not be held in contempt for violating the Protective Order.

8 The Court FURTHER ORDERS sanctions, pursuant to Rule 37 of the Federal Rules of Civil  
9 Procedure, against William Ramey and Ramey LLP. William Ramey and Ramey LLP shall  
10 reimburse Netflix and their counsel for any and all costs and fees incurred in litigating this motion,  
11 the discovery associated with it, and any other actions taken to address and remediate violations of  
12 the Protective Order by William Ramey and Ramey LLP.

13 William Ramey and Ramey LLP are FURTHER ORDERED to:

- 14 • Produce all documents and communications between the Ramey LLP law firm  
15 and current/former employees of AiPi (at all known email addresses) related  
16 to the *Valjakka v. Netflix* matters. To the extent Mr. Ramey withholds specific  
17 documents and communications on alleged privilege grounds, he shall prepare  
18 a privilege log that states, at a minimum, the identities of all recipients of the  
19 document or communication, the subject matter of any Netflix confidential  
20 information discussed in the document or communication, and, where  
21 applicable, the Bates number(s) of the Netflix confidential documents shared,  
22 summarized, or otherwise discussed with AiPi;
- 23 • Disclose the current contact information for each person presently or  
24 previously affiliated with AiPi with whom employees of Ramey LLP  
25 communicated related to the *Valjakka v. Netflix* matter, so that Netflix can  
26 contact them to ensure its confidential information has not been further  
27 disseminated, and also ensure the individuals are not prosecuting patents in  
28 violation of the prosecution bar in the Protective Order; and

- Appear for a half-day (3.5 hour) deposition concerning the communications between Ramey LLP and current/former AiPi employees that include, relate to, or otherwise discuss Netflix confidential materials.

**IT IS SO ORDERED.**

Dated: \_\_\_\_\_, 2025

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Hon. JON S. TIGAR  
DISTRICT COURT JUDGE